

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

HENG GUO JIN,

Plaintiff,

Civ No. 13-cv-6789 (CBA) (LB)

v.

HAN SUNG SIKPOOM TRADING CORP. and
CHEL CHANG,

Defendants.

DECLARATION OF ROSHNI CHAUDHARI

ROSHNI CHAUDHARI, under penalty of perjury and pursuant to 28 U.S.C. §1746,
declares as follows:

1. I am an attorney at the firm Ford & Harrison LLP, attorneys for the Defendant Han Sung Sikpoom Trading Corp. and Chel Chang (“Defendants”) in this action. I am familiar with the facts and circumstances set forth in this Declaration. I make this Declaration in support of Defendants’ Motion for Partial Summary Judgment.

2. Annexed hereto as Exhibit A is a true and correct copy of the Complaint in this action, as submitted as Exhibit A to the Deposition of Chel Chang, October 31, 2014 (“Chang Dep.”).

3. Annexed hereto as Exhibit B is a true and correct copy of Plaintiff’s Response to Interrogatories, undated, as submitted as Exhibit B to the Chang Dep.

4. Annexed hereto as Exhibit C is a true and correct copy of Plaintiff’s Responses to Disclosure Amended Interrogatories, undated, as submitted as Exhibit C to the Chang Dep.

5. Annexed hereto as Exhibit D is a true and correct copy of Plaintiff's letter, without enclosures, to this Court in response to Defendants' request for a pre-motion conference, dated December 2, 2014 and filed with this Court on the same date as document number 18 on the electronic docket.

6. Annexed hereto as Exhibit E is a true and correct copy of the transcript of the Deposition of Chel Chang, October 31, 2014.

7. Annexed hereto as Exhibit F is a true and correct copy of a portion of a customer and invoice list produced during litigation by Defendants, bearing bates number HSST2 - 00020.

Executed on February 13, 2015 in New York, New York.



Roshni Chaudhari
FordHarrison LLP
100 Park Avenue, Suite 2500
New York, New York 10017
(212) 453-5949